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Global Force Entertainment, Inc. and Jeffrey)	
Jarrett,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 3:18-cv-00749
)	
Anthem Wrestling Exhibitions, LLC,)	
)	
Defendant.)	
)	

COMES NOW Defendant Anthem Wrestling Exhibitions, LLC (“Defendant” or “Anthem Wrestling”), by and through undersigned counsel, and for reasons set out in Anthem’s Memorandum of Fact and Law filed contemporaneously with this Motion, respectfully moves the Court for a mistrial in the above captioned action. As will be more fully explained in the Memorandum of Fact and Law, Defendant believes that a mistrial is necessary for the following reasons: (1) Plaintiff’s attorney, Mr. Samuel Miller, engaged in attorney misconduct and violated express orders of the Court by (i) making a statement regarding Defendant’s corporate representative during his closing argument with the intent to prejudice the jury against Defendant and (ii) by intentionally making inflammatory statements that were not in evidence and that were ruled by the Court to be inadmissible during the liability phase of the trial; (2) Defendant was irreparably prejudiced by the inclusion of the willfulness definition in the jury instructions, without an instruction on the consequences of a finding of willfulness—that punitive damages would be awarded; and (3) the jury’s verdict on the trademark claims is inconsistent on its face.

For the foregoing reasons and the reasons stated in Defendant's Memorandum of Fact and Law, Defendant requests that its Motion for a Mistrial be granted.

Respectfully Submitted,

BASS, BERRY & SIMS PLC

/s/ Paige W. Mills

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CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2020, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following and/or served the following via U.S. Mail:

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